

**US DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

CIVIL ACTION NO
1:20-cv-00410-JD

DEBORAH CIESLIK,)	
)	
Plaintiff,)	
)	
VS.)	
)	
ROBERT HOWARD)	
)	
Defendant.)	

JOINT STATEMENT ON THE STATUS OF DISCOVERY

Pursuant to the order of the court, the parties submit their joint statement on the status of discovery. The plaintiff and defendant have engaged in written discovery and both parties have been deposed. The parties expect to exchange expert materials in accordance with the schedule set by the court.

Plaintiff anticipates the following additional discovery: Plaintiff may take depositions of Keepers of Records in Florida and/or Massachusetts where plaintiff had her medical treatment and possibly depositions of ambulance attendants who treated the plaintiff. Counsel will discuss entering into agreements as to authenticity of the records to eliminate as many of these depositions as possible. Plaintiff may propound requests for admissions to the defendant. The parties will also discuss a possible exchange of expert depositions.

Defendant anticipates the following additional discovery: Defendant is considering taking depositions of two of the friends of the Plaintiff and Defendant, these are friends who spent time with the Plaintiff and the Defendant in Florida. Defendant is also considering taking the deposition of Plaintiff's friend, Linda Ferrara, who currently resides in Massachusetts.

The parties do not request a discovery conference at this time.

Respectfully Submitted,

The Plaintiff,
By Her Attorney,

The Defendant,
By His Attorney,

/s/ David P. Angueira
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Dated: May 3, 2021

CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2021, I electronically filed the document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Alan L. Cantor
Alan L. Cantor